

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SLATER BRENNAN, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

LATCH, INC. f/k/a TS INNOVATION  
ACQUISITIONS CORP., LUKE  
SCHOENFELDER, GARTH MITCHELL, and  
BARRY SCHAFFER,

Defendants.

Case No.: 1:22-cv-07473 (JGK) (GWG)

**JOINT STIPULATION AND [PROPOSED] SCHEDULING ORDER**

Plaintiff Slater Brennan (“Plaintiff”) and Defendant Latch, Inc. f/k/a TS Innovation Acquisitions Corp. (“Latch”) (collectively, the “Parties”) hereby stipulate and agree as follows:

WHEREAS, on August 31, 2022, Plaintiff filed a complaint captioned *Brennan v. Latch Inc. f/k/a TS Innovation Acquisitions Corp.*, No. 1:22-cv-07473 (JGK) (the “Complaint,” ECF No. 1), a putative class action arising under the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act (“PSLRA”), 15 U.S.C. § 78u-4, against Defendants;

WHEREAS, Section 21D(a)(3)(A)(i) of the PSLRA, 15 U.S.C. § 78u-4(a)(3)(A)(i), requires a plaintiff to cause public notice to be published within twenty (20) days of filing a putative class action that arises under the PSLRA, which notice Plaintiff caused to be published on August 31, 2022;

WHEREAS, motions for appointment of lead plaintiff and lead counsel pursuant to Section 21D of the PSLRA will be filed with the Court on or before October 31, 2022 (within sixty (60) days after notice was published to the putative class);

WHEREAS, Defendant Latch was served with the summons and Complaint on September 20, 2022 (ECF No. 5);

WHEREAS, the Court ordered Defendant Latch to respond to the Complaint by November 2, 2022 (ECF No. 6);

WHEREAS, the Parties anticipate that the Court-appointed lead plaintiff will file an amended complaint that will supersede the Complaint;

WHEREAS, the this is the first request for an extension of time made by either Party; and

WHEREAS, the Parties agree that, for reasons of judicial efficiency and economy, conservation of time and resources, and orderly management of this action, Defendant should not respond to the Complaint but rather, should withhold responding to this action until after (i) the

Court has appointed lead plaintiff and lead counsel, and (ii) the lead plaintiff has filed an amended complaint.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel, and subject to the Court's approval, that:

1. Latch need not respond to the Complaint.
2. Within fourteen days of entry of an Order appointing lead plaintiff and approving lead counsel, Lead Counsel and counsel for Latch shall meet and confer and submit a proposed schedule for the filing of an amended complaint and for Latch's response thereto.

IT IS SO STIPULATED AND AGREED TO THIS 31<sup>st</sup> DAY OF OCTOBER, 2022.

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*Attorneys for Plaintiff Slater Brennan*

SO ORDERED:

\_\_\_\_\_, U.S.D.J.  
Judge John G. Koeltl

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<sup>1</sup> Per Southern District of New York Electronic Case Filing Rules & Instructions, Filing Rule 8.5, counsel for Slater Brennan consents to electronic signature.